

Michael E. Welsh (Massachusetts Bar No. 693537)  
welshmi@sec.gov  
Casey R. Fronk (Illinois Bar No. 6296535)  
fronkc@sec.gov  
Troy Flake (California Bar No. 267523)  
flaket@sec.gov  
Attorneys for Plaintiff  
Securities and Exchange Commission  
351 South West Temple, Suite 6.100  
Salt Lake City, Utah 84101  
Tel: (801) 524-5796

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability

Case No.: 2:23-cv-00482-RJS

**PLAINTIFF’S MOTION FOR  
LEAVE TO FILE OVERLENGTH  
OPPOSITION TO DEFENDANTS’  
MOTIONS TO DISMISS**

Chief Judge Robert J. Shelby

company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to Rule DUCivR 7-1(a)(6)(A), Plaintiff Securities and Exchange Commission (“SEC”) respectfully requests leave to file an overlength Omnibus Memorandum in Opposition to Defendants’ Motions to Dismiss. (Dkt. Nos. 182, 191, 192, 193, 196, 197). The SEC requests up to an additional 15 pages (40 in total), for the Omnibus Memorandum in Opposition to Defendants’ Motions to Dismiss.

The SEC respectfully submits that it has good cause for the need of the additional 15 pages. On October 6 and October 13, 2023, Defendants filed six separate motions to dismiss the Complaint. The SEC’s response to each of these motions is due Monday, November 13, 2023. A single omnibus opposition will prevent duplicative arguments on overlapping issues. However, given the number of moving defendants and the issues raised in these motions, additional pages are necessary to ensure that the SEC can adequately address each of the moving defendants’ arguments.

Based on the foregoing, the SEC requests leave to file an overlength Motion with an additional 15 pages (40 pages in total). A proposed Order is filed concurrently herewith.

Dated: November 11, 2023

/s/ Michael E. Welsh  
Michael E. Welsh  
Casey R. Fronk  
Troy Flake  
*Attorneys for Plaintiff U.S. Securities and  
Exchange Commission*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of November, 2023, I caused the foregoing to be served to all parties entitled to service through the Court's ECF system.

/s/ Michael E. Welsh  
MICHAEL E. WELSH  
*Attorneys for Plaintiff U.S. Securities and  
Exchange Commission*